

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

FILED

SEP 21 2006

ROBERT D. DENNIS
U.S. DIST. COURT WESTERN DISTRICT OF OKLA
BY *[Signature]*

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

NATHANIEL MARC GREENE,

Defendant.

No. **CR 06-219**

HE

Violation: 18 USC § 661
18 USC § 1001(a)(3)

INDICTMENT

The Federal Grand Jury charges:

Introduction

1. The Department of Labor is charged with administering the provisions of the Labor-Management Reporting and Disclosure Act (LMRDA) of 1959. The Act established standards for labor union democracy and financial integrity and requires reporting and public disclosure of union reports.

2. Labor Organizations that fall under the LMRDA are required to file annual financial reports with the Office of Labor Management Standards, a department within the Department of Labor. The Union's officers, including the president and secretary-treasurer are responsible for the accuracy of the reports.

3. One such report is the LM-3, a four-page financial report, which is filed by a labor union and discloses basic financial information including assets, liabilities, receipts and disbursements. The LM-3 also requires detailed disclosure of disbursements to officers.

4. **NATHANIEL MARC GREENE** was the President of American Federation of Government Employees Local Union 2562 from January 1, 2001 to December 31, 2003.

Count 1

5. From on or about February 1, 2001 and continuing through December 28, 2001, in the Western District of Oklahoma,

----- **NATHANIEL MARC GREENE** -----

the defendant herein, at a place within the special maritime and territorial jurisdiction of the United States, specifically the Department of Veterans Affairs Medical Center, in Oklahoma City, Oklahoma, did take and carry away, with intent to steal and purloin, the personal property of another, specifically funds in the amount of \$18,676.38, which belonged to the American Federation of Government Employees Union (AFGE), Local Union 2562.

All in violation of Title 18, United States Code, Section 661.

Count 2

6. From on or about January 3, 2002 and continuing through December 30, 2002, in the Western District of Oklahoma,

----- **NATHANIEL MARC GREENE** -----

the defendant herein, at a place within the special maritime and territorial jurisdiction of the United States, specifically the Department of Veterans Affairs Medical Center, in Oklahoma City,

Oklahoma, did take and carry away, with intent to steal and purloin, the personal property of another, specifically funds in the amount of \$22,228.47, which belonged to the American Federation of Government Employees Union (AFGE), Local Union 2562.

All in violation of Title 18, United States Code, Section 661.

Count 3

7. From on or about January 6, 2003 and continuing through December 17, 2003, in the Western District of Oklahoma,

----- **NATHANIEL MARC GREENE** -----

the defendant herein, at a place within the special maritime and territorial jurisdiction of the United States, specifically the Department of Veterans Affairs Medical Center, in Oklahoma City, Oklahoma, did take and carry away, with intent to steal and purloin, the personal property of another, specifically funds in the amount of \$11,638.67, which belonged to the American Federation of Government Employees Union (AFGE), Local Union 2562.

All in violation of Title 18, United States Code, Section 661.

Count 4

8. On or about April 28, 2005, at Oklahoma City, Oklahoma, in the Western District of Oklahoma,

----- **NATHANIEL MARC GREENE** -----

the defendant herein, in a matter within the jurisdiction of the Department of Labor, an agency of the United States, did knowingly and willfully make and use a material false writing and document, specifically Form LM-3 Labor Organization Annual Report for the American Federation of Government Employees Local Union 2562, filed for year 2001, wherein it was falsely reported that he received \$5,829 in disbursements from Local 2562, when in fact he knew that statement was materially false and that he had in fact received disbursements in excess of \$20,000 from the union.

All in violation of Title 18, United States Code, Section 1001(a)(3).

Count 5

9. On or about June 9, 2005, at Oklahoma City, Oklahoma, in the Western District of Oklahoma,

----- **NATHANIEL MARC GREENE** -----

the defendant herein, in a matter within the jurisdiction of the Department of Labor, an agency of the United States, did knowingly and willfully make and use a material false writing and document, specifically Form LM-3 Labor Organization Annual Report for the American Federation of Government Employees Local Union 2562, filed for year 2002, wherein it was falsely reported that he received \$9,518 in disbursements from Local 2562, when in fact he knew that statement was materially false and that he had in fact received disbursements in excess of \$25,000 from the union.

All in violation of Title 18, United States Code, Section 1001(a)(3).

Count 6

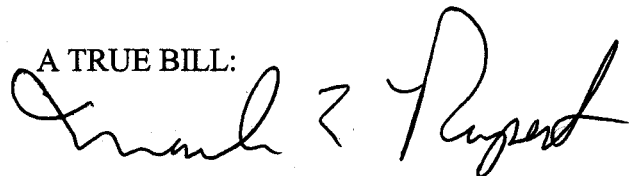
10. On or about June 9, 2005, at Oklahoma City, Oklahoma, in the Western District of Oklahoma,

----- **NATHANIEL MARC GREENE** -----

the defendant herein, in a matter within the jurisdiction of the Department of Labor, an agency of the United States, did knowingly and willfully make and use a material false writing and document, specifically Form LM-3 Labor Organization Annual Report for the American Federation of Government Employees Local Union 2562, filed for year 2003, wherein it was falsely reported that he received \$9,893 in disbursements from Local 2562, when in fact he knew that statement was materially false and that he had in fact received disbursements in excess of \$20,000 from the union.

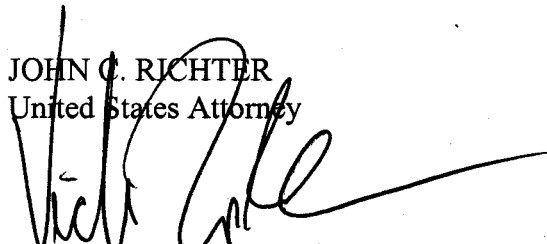
All in violation of Title 18, United States Code, Section 1001(a)(3).

A TRUE BILL:



FOREPERSON OF THE GRAND JURY

JOHN C. RICHTER
United States Attorney



VICKI ZEMP-BEHENNA
Assistant U.S. Attorney